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September 26, 1997

EX PARTE

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW  
Room 222  
Washington, DC 20554

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SEP 26 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: CC Docket No 93-162 - In the Matter of Local Exchange Carrier's Rates, Terms and Conditions for Expanded Interconnection Through Physical Collocation for Special Access and Switched Transport

Dear Mr. Caton:

The attached document, regarding the above mentioned docket, was discussed with Richard Kwiatkowski of the Competitive Pricing Division, Common Carrier Bureau on September 25, 1997.

In accordance with 47 C.F.R. § 1.1206(a)(1) of the Commission's rules, the original of this letter and one copy are being filed with your office. Acknowledgment and date of receipt are requested. A duplicate of this letter is included for this purpose.

Sincerely,

*Chris Jines*  
Attachment

cc: Richard Kwiatkowski

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		TERMINATION EQUIPMENT FUNCTION							
				Recurring					
		Partitioned from Cross Connect							
				Rate Element	Rate Element	Rate Element	Rate Element	Rate Element	Rate Element
				Name #1	Name #2	Name #3	Name #4	Name #5	Name #6
				DS1	DS1 POT Bay	DS1 Repeater	DS3	DS3 POT Bay	DS3 Repeater
1	TOTAL INVESTMENT (List)			\$215.58	\$21.74	\$323.99	\$2,544.09	\$257.15	\$1,639.64
	Account Name	Acct #	Depr Life						
2	Land	2111	N/A	\$1.76	\$0.18	\$2.64	\$20.75	\$2.10	\$13.38
3	Building	2121	34.5 Yrs	\$20.53	\$2.07	\$30.86	\$242.30	\$24.49	\$156.16
4	Digital Circuit COE	2232	11.8 Yrs	\$193.29	\$19.49	\$290.49	\$2,281.04	\$230.56	\$1,470.10
5	Conduit	2441	45.5 Yrs						
6									
7	(State & Federal Income Tax)			\$5.36	\$0.54	\$8.05	\$63.21	\$6.39	\$40.74
8	DEPRECIATION			\$17.02	\$1.72	\$25.59	\$200.91	\$20.31	\$129.49
9	COM (\$)			\$13.54	\$1.36	\$20.34	\$159.75	\$16.15	\$102.96
10	COM (As a Percent of Gross Investment)			6.28%	6.26%	6.28%	6.28%	6.28%	6.28%
11	FEDERAL INCOME TAX			\$4.21	\$0.42	\$6.32	\$49.62	\$5.02	\$31.98
12	STATE/LOCAL INC TAX			\$1.15	\$0.12	\$1.73	\$13.59	\$1.37	\$8.76
13	OTHER TAX: See Admin (Below, Lns 38 &39)								
14	MAINTENANCE EXPENSE			\$2.74	\$0.28	\$4.12	\$32.36	\$3.27	\$20.85
15	TOTAL ADMINISTRATIVE EXPENSE (List)			\$11.64	\$1.17	\$17.49	\$137.30	\$13.88	\$88.49
16	Sales	6612		\$1.08	\$0.11	\$1.63	\$12.76	\$1.29	\$8.22
17	Product Advertising	6613		\$0.01	\$0.00	\$0.01	\$0.09	\$0.01	\$0.06
18	Product Mangement	6611		\$0.57	\$0.06	\$0.86	\$6.78	\$0.69	\$4.37
19	Customer Service	6623		\$1.46	\$0.15	\$2.19	\$17.23	\$1.74	\$11.10
20	Operator Services	6621		\$0.12	\$0.01	\$0.17	\$1.37	\$0.14	\$0.88
21	Number Service	6622		\$0.64	\$0.06	\$0.97	\$7.60	\$0.77	\$4.90
22	Accounting	6721		\$0.17	\$0.02	\$0.26	\$2.04	\$0.21	\$1.32
23	Human Resources	6723		\$0.40	\$0.04	\$0.61	\$4.76	\$0.48	\$3.07
24	Motor Vehicle Expense	6112		\$0.01	\$0.00	\$0.01	\$0.06	\$0.01	\$0.04
25	Land & Building Expense	6121*		\$0.84	\$0.08	\$1.26	\$9.90	\$1.00	\$6.38
26	Gen Purpose Computers	6124		\$0.20	\$0.02	\$0.30	\$2.34	\$0.24	\$1.51
27	Network Administration	6532		\$0.43	\$0.04	\$0.65	\$5.08	\$0.51	\$3.28
28	Testing	6533		\$0.11	\$0.01	\$0.17	\$1.35	\$0.14	\$0.87

Page 2

2	Land	2111	N/A	\$0.52	\$0.05	\$0.77	\$6.88	\$0.70	\$3.91
3	Building	2121	34.5 Yrs	\$6.01	\$0.61	\$9.03	\$80.37	\$8.12	\$45.70
4	Digital Circuit COE	2232	11.8 Yrs	\$56.58	\$5.70	\$85.00	\$756.53	\$76.47	\$430.16
5	Conduit	2441	45.5 Yrs						
6									
7	(State & Federal Income Tax)			\$1.57	\$0.16	\$2.36	\$20.96	\$2.12	\$11.92
8	DEPRECIATION			\$4.99	\$0.50	\$7.49	\$66.63	\$6.74	\$37.89
9	COM (\$)			\$3.96	\$0.40	\$5.95	\$52.98	\$5.36	\$30.13
10	COM (As a Percent of Gross Investment)			6.27%	6.29%	6.28%	6.28%	6.28%	6.28%
11	FEDERAL INCOME TAX			\$1.23	\$0.13	\$1.85	\$16.45	\$1.66	\$9.38
12	STATE/LOCAL INC TAX			\$0.34	\$0.03	\$0.51	\$4.51	\$0.46	\$2.56
13	OTHER TAX: See Admin (Below, Lns 38 & 39)								
14	MAINTENANCE EXPENSE			\$0.80	\$0.08	\$1.21	\$10.73	\$1.09	\$6.10
15	TOTAL ADMINISTRATIVE EXPENSE (List)			\$3.41	\$0.34	\$5.12	\$45.54	\$4.60	\$25.89
16	Sales	6612		\$0.32	\$0.03	\$0.48	\$4.23	\$0.43	\$2.41
17	Product Advertising	6613		\$0.00	\$0.00	\$0.00	\$0.03	\$0.00	\$0.02
18	Product Mangement	6611		\$0.17	\$0.02	\$0.25	\$2.25	\$0.23	\$1.28
19	Customer Service	6623		\$0.43	\$0.04	\$0.64	\$5.71	\$0.58	\$3.25
20	Operator Services	6621		\$0.03	\$0.00	\$0.05	\$0.45	\$0.05	\$0.26
21	Number Service	6622		\$0.19	\$0.02	\$0.28	\$2.52	\$0.25	\$1.43
22	Accounting	6721		\$0.05	\$0.01	\$0.08	\$0.68	\$0.07	\$0.38
23	Human Resources	6723		\$0.12	\$0.01	\$0.18	\$1.58	\$0.16	\$0.90
24	Motor Vehicle Expense	6112		\$0.00	\$0.00	\$0.00	\$0.02	\$0.00	\$0.01
25	Land & Building Expense	6121*		\$0.25	\$0.02	\$0.37	\$3.28	\$0.33	\$1.87
26	Gen Purpose Computers	6124		\$0.06	\$0.01	\$0.09	\$0.78	\$0.08	\$0.44
27	Network Administration	6532		\$0.13	\$0.01	\$0.19	\$1.69	\$0.17	\$0.98
28	Testing	6533		\$0.03	\$0.00	\$0.05	\$0.45	\$0.05	\$0.26
29	Plant Operations Admin	6534		\$0.25	\$0.02	\$0.37	\$3.28	\$0.33	\$1.86
30	Engineering	6535		\$0.57	\$0.06	\$0.86	\$7.64	\$0.77	\$4.35
31	External Relations	6722		\$0.04	\$0.00	\$0.06	\$0.50	\$0.06	\$0.29
32	Information Management	6724		\$0.35	\$0.04	\$0.53	\$4.69	\$0.47	\$2.67
33	Procurement	6726		\$0.05	\$0.01	\$0.08	\$0.69	\$0.07	\$0.39
34	Other General/Admin	6728.5		\$0.02	\$0.00	\$0.03	\$0.31	\$0.03	\$0.17
35	Analog Electronic Transfers	6211.8		(\$0.05)	(\$0.01)	(\$0.08)	(\$0.69)	(\$0.07)	(\$0.39)
36	Digital Electronic Transfers	6212.8		(\$0.01)	(\$0.00)	(\$0.02)	(\$0.15)	(\$0.02)	(\$0.09)

37	Electromechanical Transfers	6215.8		(\$0.00)	(\$0.00)	(\$0.00)	(\$0.02)	(\$0.00)	(\$0.01)
38	Circuit Equipment Transfers	6232.8		(\$0.04)	(\$0.00)	(\$0.06)	(\$0.50)	(\$0.05)	(\$0.28)
39	Underground Cable Transfers	6422.8		(\$0.00)	(\$0.00)	(\$0.00)	(\$0.00)	(\$0.00)	(\$0.00)
40	Property Taxes	7240.1		\$0.40	\$0.04	\$0.60	\$5.35	\$0.54	\$3.04
41	Oth Operating Taxes	7240*		\$0.03	\$0.00	\$0.04	\$0.39	\$0.04	\$0.22
42	Amounts Chgd Construction	7340		(\$0.09)	(\$0.01)	(\$0.13)	(\$1.16)	(\$0.12)	(\$0.68)
43	Official Company Services	*		\$0.12	\$0.01	\$0.17	\$1.55	\$0.16	\$0.88
44	ANNUAL COST PER UNIT			\$14.73	\$1.48	\$22.13	\$196.84	\$19.91	\$111.93
45	MONTHLY COST PER UNIT			\$1.23	\$0.12	\$1.84	\$16.40	\$1.66	\$9.33
46	MONTHLY RATE PER UNIT			\$1.35	\$0.14	\$2.03	\$18.05	1.83	\$10.27
47	UNIT OF MEASUREMENT			Cross Connect	Cross Connect	Cross Connect	Cross Connect	Cross Connect	Cross Connect
48	RATIO: Rate/Direct Cost less Direct Admin			1.43	1.47	1.43	1.43	1.43	1.43
49	RATIO: Rate/Total Direct Cost			1.10	1.14	1.10	1.10	1.10	1.10
* NOTES									
Line 26: Excludes 6121.1 (Land & Building Maintenance) which is in the Building Maintenance Factor									
Line 41: Excludes 7240.1 (Property Taxes)									
Line 43: Official Company Services is comprised of multiple accounts									
<b>CROSS CONNECTION EQUIPMENT FUNCTION</b>									
<b>Recurring</b>									
<b>Partitioned from Cross Connect</b>									
				<b>Rate Element</b>	<b>Rate Element</b>	<b>Rate Element</b>	<b>Rate Element</b>	<b>Rate Element</b>	<b>Rate Element</b>
				<b>Name #1</b>	<b>Name #2</b>	<b>Name #3</b>	<b>Name #4</b>	<b>Name #5</b>	<b>Name #6</b>
				<b>DS1</b>	<b>DS1 POT Bay</b>	<b>DS1 Repeater</b>	<b>DS3</b>	<b>DS3 POT Bay</b>	<b>DS3 Repeater</b>
1	TOTAL INVESTMENT (List)			\$49.37	\$4.97	\$74.19	\$0.00	\$0.00	\$375.47
	<u>Account Name</u>	<u>Acct #</u>	<u>Depr Life</u>						
2	Land	2111	N/A	\$0.40	\$0.04	\$0.60	\$0.00	\$0.00	\$3.06
3	Building	2121	34.5 Yrs	\$4.71	\$0.47	\$7.07	\$0.00	\$0.00	\$35.76
4	Digital Circuit COE	2232	11.8 Yrs	\$44.26	\$4.46	\$66.52	\$0.00	\$0.00	\$336.65
5	Conduit	2441	45.5 Yrs						
6									
7	(State & Federal Income Tax)			\$1.23	\$0.12	\$1.84	\$0.00	\$0.00	\$9.33
8	DEPRECIATION			\$3.80	\$0.39	\$5.86	\$0.00	\$0.00	\$29.65
9	COM (\$)			\$3.10	\$0.31	\$4.66	\$0.00	\$0.00	\$23.58

10	COM (As a Percent of Gross Investment)		6.28%	6.24%	6.28%	#DIV/0!	#DIV/0!	6.28%
11	FEDERAL INCOME TAX		\$0.97	\$0.09	\$1.44	\$0.00	\$0.00	\$7.32
12	STATE/LOCAL INC TAX		\$0.26	\$0.03	\$0.40	\$0.00	\$0.00	\$2.01
13	OTHER TAX: See Admin (Below, Lns 38 & 39)							
14	MAINTENANCE EXPENSE		\$0.63	\$0.06	\$0.94	\$0.00	\$0.00	\$4.78
15	TOTAL ADMINISTRATIVE EXPENSE (List)		\$2.66	\$0.27	\$4.00	\$0.00	\$0.00	\$20.26
16	Sales	6612	\$0.25	\$0.03	\$0.37	\$0.00	\$0.00	\$1.88
17	Product Advertising	6613	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.01
18	Product Mangement	6611	\$0.13	\$0.01	\$0.20	\$0.00	\$0.00	\$1.00
19	Customer Service	6623	\$0.33	\$0.03	\$0.50	\$0.00	\$0.00	\$2.54
20	Operator Services	6621	\$0.03	\$0.00	\$0.04	\$0.00	\$0.00	\$0.20
21	Number Service	6622	\$0.15	\$0.01	\$0.22	\$0.00	\$0.00	\$1.12
22	Accounting	6721	\$0.04	\$0.00	\$0.06	\$0.00	\$0.00	\$0.30
23	Human Resources	6723	\$0.09	\$0.01	\$0.14	\$0.00	\$0.00	\$0.70
24	Motor Vehicle Expense	6112	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.01
25	Land & Building Expense	6121*	\$0.19	\$0.02	\$0.29	\$0.00	\$0.00	\$1.46
26	Gen Purpose Computers	6124	\$0.05	\$0.00	\$0.07	\$0.00	\$0.00	\$0.34
27	Network Administration	6532	\$0.10	\$0.01	\$0.15	\$0.00	\$0.00	\$0.75
28	Testing	6533	\$0.03	\$0.00	\$0.04	\$0.00	\$0.00	\$0.20
29	Plant Operations Admin	6534	\$0.19	\$0.02	\$0.29	\$0.00	\$0.00	\$1.46
30	Engineering	6535	\$0.45	\$0.05	\$0.67	\$0.00	\$0.00	\$3.40
31	External Relations	6722	\$0.03	\$0.00	\$0.04	\$0.00	\$0.00	\$0.22
32	Information Management	6724	\$0.27	\$0.03	\$0.41	\$0.00	\$0.00	\$2.09
33	Procurement	6726	\$0.04	\$0.00	\$0.06	\$0.00	\$0.00	\$0.31
34	Other General/Admin	6728.5	\$0.02	\$0.00	\$0.03	\$0.00	\$0.00	\$0.14
35	Analog Electronic Transfers	6211.8	(\$0.04)	(\$0.00)	(\$0.06)	\$0.00	\$0.00	(\$0.31)
36	Digital Electronic Transfers	6212.8	(\$0.01)	(\$0.00)	(\$0.01)	\$0.00	\$0.00	(\$0.07)
37	Electromechanical Transfers	6215.8	(\$0.00)	(\$0.00)	(\$0.00)	\$0.00	\$0.00	(\$0.01)
38	Circuit Equipment Transfers	6232.8	(\$0.03)	(\$0.00)	(\$0.04)	\$0.00	\$0.00	(\$0.22)
39	Underground Cable Transfers	6422.8	(\$0.00)	(\$0.00)	(\$0.00)	\$0.00	\$0.00	(\$0.00)
40	Property Taxes	7240.1	\$0.31	\$0.03	\$0.47	\$0.00	\$0.00	\$2.38
41	Oth Operating Taxes	7240*	\$0.02	\$0.00	\$0.03	\$0.00	\$0.00	\$0.17
42	Amounts Chgd Construction	7340	(\$0.07)	(\$0.01)	(\$0.10)	\$0.00	\$0.00	(\$0.52)
43	Official Company Services	*	\$0.09	\$0.01	\$0.14	\$0.00	\$0.00	\$0.69
44	ANNUAL COST PER UNIT		\$11.52	\$1.15	\$17.30	\$0.00	\$0.00	\$87.60



45	MONTHLY COST PER UNIT			\$0.96	\$0.10	\$1.44	\$0.00	\$0.00	\$7.30
46	MONTHLY RATE PER UNIT			\$1.05	\$0.11	\$1.59	\$0.00	\$0.00	\$8.03
47	UNIT OF MEASUREMENT			Cross Connect	Cross Connect	Cross Connect	Cross Connect	Cross Connect	Cross Connect
48	RATIO: Rate/Direct Cost less Direct Admin			1.42	1.50	1.43	#DIV/0!	#DIV/0!	1.43
49	RATIO: Rate/Total Direct Cost			1.09	1.15	1.10	#DIV/0!	#DIV/0!	1.10
	• NOTES								
	Line 25: Excludes 6121.1 (Land & Building Maintenance) which is in the Building Maintenance Factor								
	Line 41: Excludes 7240.1 (Property Taxes)								
	Line 43: Official Company Services is comprised of multiple accounts								